

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PAUL FINKELSTEIN,

Plaintiff,

v.

LEACHGARNER, INC.

Defendant.

Civil Action No. 1:22-CV-11116-NMG

JOINT STATEMENT

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(d), Plaintiff, Paul Finkelstein and Defendant LeachGarner, Inc., (collectively, the “Parties”) submit the following Joint Statement. Counsel for the Parties have conferred pursuant to Fed. R. Civ. P. 26(f), Fed. R. Civ. P. 16(b) and Local Rule 16.1. The Parties do not object to the Court setting a schedule based on the proposed deadlines herein.

A. PROPOSED PRE-TRIAL SCHEDULE

In order to litigate the issues of this case in the most efficient manner, the Parties jointly propose the following schedule:

| <u>Event</u> | <u>Deadline</u> |
|---------------------------------------|------------------|
| Initial Disclosures Completed: | October 3, 2022 |
| Motions to Amend Pleadings served by: | December 1, 2022 |

Fact Discovery Deadline

| | |
|------------------------------|----------------|
| Written Discovery served by: | March 31, 2022 |
| Discovery completed by: | June 30, 2023 |

Dispositive Motions

| | |
|--|--------------------|
| Dispositive motions filed by: | July 31, 2023 |
| Oppositions to dispositive motions filed by: | August 31, 2023 |
| Reply brief, if applicable, filed by: | September 14, 2023 |
| Status Conference | TBD by court |
| Pretrial Conference | TBD by court |

Expert Discovery

The Parties agree to propose a schedule for expert discovery, if any, after the close of fact discovery.

B. SCOPE OF DISCOVERY

The parties do not anticipate the need for any modification of discovery limitations under the Federal Rules of Civil Procedure or the Local Rules of the District of Massachusetts.

C. CERTIFICATION OF CONFERENCE REGARDING BUDGET AND ALTERNATIVE DISPUTE RESOLUTION

Certifications pursuant to Local Rule 16.1(d)(3) will be submitted by the Parties separately.

D. SETTLEMENT PROPOSALS

Plaintiff has provided a settlement demand to Defendant.

E. CONSIDERATION OF CONSENT TO TRIAL BY MAGISTRATE JUDGE

The Parties do not consent to proceeding to trial by a magistrate judge.

Respectfully Submitted,

Plaintiff

By His attorney,

/s/ Suzanne Herold

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Defendant,

By Its attorneys,

/s/ Sarah E. Lovejoy

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Dated: September 9, 2022

CERTIFICATE OF SERVICE

This hereby certifies that on this 9th day of September 2022 a true and accurate copy of the above document was filed with the Court via the ECF system and served upon all counsel of record.

/s/ Sarah E. Lovejoy
Jackson Lewis P.C.

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